

EXHIBIT LIST

1. Deposition of Dan Hollings, excerpts
2. Declaration of Robert E. Rainone
  - A. Selected invoice/payment emails
3. Deposition of Loretta Hollings, excerpts

# EXHIBIT 1

Hollings, Dan (Cedillo)

TS Merchandising v. Hollings

March 12, 2008

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TS Merchandising Ltd., a British )  
Virgin Islands corporation, and TS )  
Production LLC, a Hungarian )  
limited liability company, )

Plaintiffs, )

vs. )

Dan and Loretta Hollings, Arizona )  
residents, and Web Services, LLC, )  
an Arizona limited liability )  
company, )

Defendants. )

No. 07 C 6518

DEPOSITION OF DAN HOLLINGS

Tucson, Arizona  
March 12, 2008  
8:59 a.m.

Prepared for:  
MR. CHRISTOPHER I. CEDILLO

(Copy)

Prepared By:  
LISA J. ANDERSON, RPR  
Certified Reporter  
Certificate Number 50079  
CANYON STATE REPORTING  
2415 E. Camelback, Suite 700  
Phoenix, AZ 85016-4245

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09:05:09 1 Q. About eight years?

09:05:10 2 A. Yes.

09:05:16 3 Q. What's your present address?

09:05:18 4 A. 6370 Via Amable, A-M-A-B-L-E.

09:05:31 5 Q. And is that in Tucson?

09:05:33 6 A. Yes.

09:05:35 7 Q. How long have you resided there?

09:05:39 8 A. Approximately -- little over six years.

09:05:56 9 Q. Does anyone else reside there?

09:05:58 10 A. My wife.

09:06:03 11 Q. Anyone else?

09:06:05 12 A. No.

09:06:07 13 Q. Do you own your home?

09:06:09 14 A. I do.

09:06:12 15 Q. How long have you owned it?

09:06:15 16 A. As long as I've lived there. Approximately six  
09:06:18 17 years.

09:06:35 18 Q. Do you pay a monthly mortgage?

09:06:38 19 A. I do.

09:06:43 20 Q. Are there any other persons listed on your  
09:06:46 21 mortgage as being obliged to pay?

09:06:51 22 A. No.

09:06:52 23 Q. Just you?

09:06:53 24 A. No. Myself and my wife.

09:07:01 25 Q. Do you have any other homes?

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09:07:02 1 A. No.

09:07:15 2 Q. Do you have any vehicles?

09:07:17 3 A. Yes.

09:07:17 4 Q. Automobiles?

09:07:18 5 A. Yes.

09:07:19 6 Q. How many?

09:07:20 7 A. Two.

09:07:27 8 Q. Are those paid for?

09:07:28 9 A. Yes.

09:07:29 10 Q. And to whom are they titled?

09:07:36 11 A. To myself and my wife.

09:07:38 12 Q. Together?

09:07:40 13 A. Yes.

09:07:50 14 Q. Do you have any telephones, Mr. Hollings?

09:07:55 15 A. Yes.

09:07:57 16 Q. Maybe I should be clear. Any telephone numbers  
09:08:04 17 that you are responsible for, as opposed to the number of  
09:08:07 18 telephones?

09:08:09 19 A. Yes.

09:08:10 20 Q. How many?

09:08:14 21 A. Two. Oh, I'm sorry. Three.

09:08:23 22 Q. Three numbers?

09:08:25 23 A. Uh-huh.

09:08:25 24 Q. Can you tell me what those numbers are, please?

09:08:27 25 A. I have a cell phone number, I have a home phone

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09:09:42 1 Q. How long have you had that number?

09:09:47 2 A. About eight years.

09:09:51 3 Q. Longer than you've been in your current home?

09:09:54 4 A. Yes. I think it was transferred over.

09:09:57 5 Q. Okay. And who is the carrier for that number?

09:10:04 6 A. It's MCI.

09:10:16 7 Q. Who is the carrier for your home office number?

09:10:19 8 A. It's the same.

09:10:21 9 Q. And that phone number?

09:10:22 10 A. 520-299-5626.

09:10:36 11 Q. Who is responsible for paying the bills on those  
09:10:39 12 lines?

09:10:41 13 A. I am.

09:10:43 14 Q. Is there more than one person, meaning you,  
09:10:47 15 listed on the phone bills for those? How about for the  
09:10:56 16 home number?

09:10:58 17 A. The two numbers are together on the same  
09:11:02 18 account.

09:11:02 19 Q. Okay.

09:11:03 20 A. With MCI. And it -- I can't remember who is on  
09:11:09 21 the bill. It's either me or my wife or both of us. I  
09:11:13 22 can't recall.

09:11:13 23 Q. Okay. Does your wife have a cell phone?

09:11:22 24 A. She has an iPhone. Same account.

09:11:29 25 Q. Did she have a cell phone before the iPhone?

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09:11:33 1 A. Let's see. Yes.

09:11:42 2 Q. Was that also operated through MCI?

09:11:51 3 A. No, it was always AT&T.

09:11:54 4 Q. Oh, excuse me. This is the cell phone that she  
09:11:58 5 had before the iPhone?

09:12:00 6 A. Yes. And for clarity, it wasn't that she had a  
09:12:04 7 cell phone, we just had a cell phone that we shared  
09:12:08 8 between us.

09:12:15 9 Q. And the carrier for that was AT&T?

09:12:19 10 A. AT&T.

09:12:23 11 Q. Do you recall that phone number?

09:12:28 12 A. I believe that it was 520-360-5001.

09:13:10 13 Q. I assume you are familiar with the movie called  
09:13:14 14 The Secret?

09:13:15 15 A. I am.

09:13:15 16 Q. Were you engaged to provide services in relation  
09:13:19 17 to that movie?

09:13:20 18 A. I was.

09:13:22 19 Q. When did that engagement occur?

09:13:27 20 A. In 2005.

09:13:33 21 Q. In September of 2005?

09:13:38 22 A. I would have to check my records, but I believe  
09:13:40 23 so.

09:13:48 24 Q. And how long did you provide those services?

09:13:53 25 A. For 17 months.

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09:14:01 1 Q. So that would be approximately until February of  
09:14:04 2 2007?

09:14:05 3 A. Correct.

09:14:15 4 Q. What exactly were the nature of the services  
09:14:26 5 that you provided?

09:14:27 6 A. Internet marketing, internet strategy, web site  
09:14:32 7 development and numerous related internet needs.

09:14:46 8 Q. Can you describe some of these related internet  
09:14:50 9 needs?

09:14:51 10 A. Setting up and establishing customer support,  
09:14:56 11 web based. Helping to set up shopping cart services,  
09:15:12 12 fulfillment services, programming and additional products  
09:15:31 13 and services that were sold via the web site and  
09:15:42 14 coordinating internet activities with the various teachers  
09:15:52 15 that appeared in the movie.

09:16:00 16 Q. Can you describe the shopping cart services?

09:16:06 17 A. The Secret needed a unique shopping cart that  
09:16:12 18 wasn't available from an off-the-shelf software program,  
09:16:16 19 so I spec'd the requirements for that particular shopping  
09:16:21 20 cart so that it could be built by programmers that were  
09:16:26 21 paid for through the fulfillment provided.

09:16:33 22 Q. And just for clarity sake, when we're speaking  
09:16:38 23 about a shopping cart we're referring to some kind of  
09:16:41 24 functionality on the internet; correct?

09:16:43 25 A. Correct.



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09:20:54 1 Q. Who told you about the concept of the movie?

09:20:57 2 A. Rhonda Byrne.

09:21:02 3 Q. Okay. You suggested that there were products  
09:21:09 4 available on the web site for The Secret; is that correct?

09:21:11 5 A. Correct.

09:21:12 6 Q. Did you receive instructions from anyone on what  
09:21:18 7 products to make available on that site?

09:21:24 8 A. No.

09:21:26 9 Q. You had sole discretion to choose what products  
09:21:31 10 to put on the web site?

09:21:32 11 A. No. I offered up suggestions to them about  
09:21:39 12 additional products.

09:21:40 13 Q. Who is "them"?

09:21:41 14 A. Rhonda Byrne and Paul Harrington.

09:21:53 15 Q. Did you ever offer suggestions to Bob Rainone?

09:21:58 16 A. Couple of months after I came on board, Bob  
09:22:06 17 Rainone joined the company and, at that point, I shared

09:22:14 18 with him the products and services that I had already

09:22:17 19 introduced to Rhonda and Paul.

09:22:27 20 Q. How did you share those with him? And I guess I  
09:22:30 21 should be clearer. I mean by what medium did you share

09:22:34 22 those? Did you speak to him in person, did you send an  
09:22:38 23 e-mail?

09:22:39 24 MR. PARKER: Counsel, with whom?

09:22:41 25 MR. CEDILLO: Excuse me?

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09:22:42 1 MR. PARKER: You said "with him." Can you

09:22:45 2 identify the "him"?

09:22:46 3 MR. CEDILLO: Bob.

09:22:48 4 THE WITNESS: With Bob?

09:22:49 5 BY MR. CEDILLO:

09:22:49 6 Q. Yes.

09:22:50 7 A. Primarily e-mail.

09:22:57 8 Q. Did he ever respond to your e-mails?

09:22:59 9 A. Yes.

09:23:00 10 Q. Did he usually respond to your e-mails?

09:23:03 11 A. Define "usually."

09:23:05 12 Q. However you would like.

09:23:08 13 A. He usually did.

09:23:17 14 Q. Did you ever phone Bob?

09:23:21 15 A. Occasionally.

09:23:31 16 Q. Do you know what his phone number is?

09:23:33 17 A. By memory, no.

09:23:35 18 Q. Okay. Did you ever address these issues with

09:23:53 19 Bob in person?

09:23:55 20 A. What issues?

09:23:56 21 Q. You described that you discussed content,

09:24:04 22 products, for example, with him by e-mail, by phone

09:24:09 23 occasionally in the first a couple of months after you had

09:24:15 24 arrived and he arrived?

09:24:19 25 A. Uh-huh.

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09:32:58 1 Q. Mr. Hollings, I'm going to show you a document  
09:33:06 2 that I'll represent is an e-mail from you sent on Monday,  
09:33:12 3 November 21st, 2005 at 4:53 p.m. The Bates label is  
09:33:18 4 TS 00010.

09:33:22 5 A. Uh-huh.

09:33:23 6 Q. Is that an accurate description of the document?

09:33:28 7 A. Yes.

09:33:28 8 Q. Can you describe the rest of it, the content?

09:33:45 9 A. It's an invoice from me to The Secret LLC.

09:33:55 10 Q. An invoice for services that you provided?

09:33:58 11 A. Correct.

09:34:03 12 Q. And you said it's addressed to The Secret LLC?

09:34:07 13 A. That is correct.

09:34:08 14 Q. Does it have an address on it for The Secret  
09:34:13 15 LLC?

09:34:13 16 A. Yes, it does.

09:34:14 17 Q. Can you read the address, please?

09:34:16 18 A. 1339 West George Street, Chicago, Illinois

09:34:21 19 60657.

09:34:30 20 Q. Did you put this invoice together?

09:34:32 21 A. Yes, I did.

09:34:34 22 Q. Did you include the address for The Secret?

09:34:37 23 A. Yes, I did.

09:34:41 24 Q. So you knew, at least in November of 2005, that

09:34:51 25 the entity to whom you were sending invoices for your

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09:34:54 1 services was located in Chicago?

09:34:56 2 A. That's correct.

09:35:17 3 Q. Does this document have an invoice number on it?

09:35:20 4 A. Invoice 00002.

09:35:28 5 Q. Does that mean it was the second invoice you  
09:35:31 6 sent for your services?

09:35:32 7 A. Possibly.

09:35:53 8 (Exhibit Number 2 was marked for  
09:35:54 9 identification.)

09:35:54 10 BY MR. CEDILLO:

09:35:54 11 Q. This is a document Bates labeled TS 00013, an  
09:35:59 12 e-mail from Dan Hollings sent on Thursday, December 8th,  
09:36:04 13 2005. Is that an accurate description of the document?

09:36:07 14 A. Correct.

09:36:08 15 Q. At least the headers. Can you describe the  
09:36:11 16 content for me?

09:36:12 17 A. It's an invoice from me to The Secret LLC.

09:36:19 18 Q. Does it have a number on it?

09:36:21 19 A. Invoice 00003.

09:36:25 20 Q. And does it have an address for The Secret LLC?

09:36:30 21 A. Yes, it does.

09:36:31 22 Q. What is the address?

09:36:32 23 A. 1339 West George Street, Chicago, Illinois  
09:36:38 24 60657.

09:36:39 25 Q. Did you continue to send invoices for your

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09:36:42 1 services during the rest of your time working for The

09:36:50 2 Secret?

09:36:50 3 A. Yes. I invoiced monthly.

09:36:52 4 Q. Every month?

09:36:53 5 A. Every month.

09:36:54 6 Q. Until approximately February 2007?

09:37:00 7 A. Correct.

09:37:01 8 Q. Did any of your invoices not include a Chicago

09:37:04 9 address for The Secret?

09:37:09 10 A. The first one went to PrimeTime, Rhonda Byrne,  
09:37:15 11 in Australia.

09:37:15 12 Q. Did any of the invoices, from Invoice 00002  
09:37:22 13 through the last one you sent, have an address other than

09:37:25 14 Chicago?

09:37:28 15 A. I can't recall the addresses on all of the  
09:37:33 16 invoices.

09:37:56 17 (Exhibit Number 3 was marked for  
09:37:57 18 identification.)

09:37:57 19 BY MR. CEDILLO:

09:37:58 20 Q. This is a document Bates labeled TS 00014. Can  
09:38:02 21 you describe the document, please.

09:38:05 22 A. It's an invoice from me to The Secret LLC.

09:38:12 23 Q. Does it have a Chicago address for The Secret?

09:38:14 24 A. Yes, it does.

09:38:19 25 Q. It contains a line item described as

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09:38:28 1 reimbursement, semicolon, marketing costs, Google for

09:38:36 2 \$508; is that correct?

09:38:38 3 A. That's correct.

09:38:38 4 Q. Is that for reimbursement of monies paid by you  
09:38:48 5 for the Google AdWord campaign?

09:38:53 6 A. That is correct.

09:38:53 7 Q. So this is one example for how you sought  
09:38:57 8 reimbursement for the Google AdWord campaign?

09:39:00 9 A. Correct.

09:39:00 10 Q. And you sent this invoice to The Secret LLC with  
09:39:13 11 a Chicago address?

09:39:15 12 A. Via e-mail, yes.

09:39:16 13 Q. And your e-mail listed the Chicago address,  
09:39:19 14 correct, for The Secret LLC?

09:39:22 15 A. Yes. This invoice shows the Chicago address.

09:39:25 16 Q. Okay. And you created the invoice?

09:39:29 17 A. That is correct.

09:39:49 18 Q. I'll ask again: Did any of the invoices that  
09:39:53 19 you sent for your services after the second invoice, or  
09:39:59 20 the one that's designated as Invoice 00002, did any of  
09:40:11 21 those following that not contain a Chicago address?

09:40:16 22 A. I can't recall all of the addresses on all of  
09:40:18 23 the invoices.

09:40:23 24 Q. Okay.

09:40:23 25 (Exhibit Number 4 was marked for

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09:40:39 1 identification.)

09:40:39 2 BY MR. CEDILLO:

09:40:40 3 Q. This is a document Bates labeled TS 00015. Can  
09:40:45 4 you describe the document, please?

09:40:51 5 A. It's an invoice from me to The Secret.

09:40:57 6 Q. And did you draft this invoice?

09:41:00 7 A. Yes.

09:41:02 8 Q. Does it contain a Chicago address for The  
09:41:07 9 Secret?

09:41:07 10 A. Yes.

09:41:07 11 Q. And for what month was this invoice?

09:41:19 12 A. Oh, February.

09:41:21 13 Q. February of?

09:41:22 14 A. 2006.

09:41:24 15 Q. Thank you. And like Invoice 4, this one also  
09:41:33 16 contains a line item for reimbursement of marketing costs  
09:41:37 17 for the Google AdWord program; correct?

09:41:42 18 A. Correct.

09:41:43 19 Q. So when you sought reimbursement for those you  
09:41:46 20 sent an invoice to The Secret?

09:41:50 21 A. Correct.

09:41:52 22 Q. And you were paid for those?

09:41:53 23 A. Correct.

09:42:02 24 Q. The invoice also shows a line item for web  
09:42:08 25 services/project management; is that correct?

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09:42:12 1 A. Correct.

09:42:13 2 Q. And you invoiced The Secret for \$8,000 for that?

09:42:17 3 A. Correct.

09:42:18 4 Q. And were you paid that amount?

09:42:24 5 A. Correct.

09:42:31 6 Q. I'm sorry, was that -- does that mean you were  
09:42:35 7 paid that amount?

09:42:36 8 A. Yes.

09:42:37 9 Q. Okay.

09:42:37 10 (Exhibit Number 5 was marked for

09:42:41 11 identification.)

09:42:41 12 BY MR. CEDILLO:

09:42:42 13 Q. This is a document labeled TS 00016. Can you  
09:42:56 14 describe this document, Mr. Hollings?

09:43:00 15 A. This is an invoice from me to The Secret.

09:43:07 16 Q. And invoice number?

09:43:08 17 A. 00006.

09:43:18 18 Q. You drafted this invoice?

09:43:19 19 A. Yes.

09:43:23 20 Q. And you included the Chicago address for The  
09:43:29 21 Secret LLC; is that correct?

09:43:30 22 A. That is correct.

09:43:31 23 Q. Was this invoice paid?

09:43:34 24 A. Yes.

09:43:34 25 (Exhibit Number 6 was marked for

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09:44:03 1 identification.)

09:44:03 2 BY MR. CEDILLO:

09:44:03 3 Q. This is a document Bates labeled 00017 and

09:44:14 4 00018. Can you describe the invoice, please? Or excuse

09:44:17 5 me, can you describe the document?

09:44:21 6 A. This is an invoice from me to The Secret.

09:44:29 7 Q. Did you draft the invoice?

09:44:35 8 A. Yes.

09:44:46 9 Q. Did you include a Chicago address for The Secret

09:44:49 10 LLC?

09:44:50 11 A. Yes.

09:44:50 12 Q. Was this invoice paid?

09:44:52 13 A. Yes.

09:44:53 14 Q. In this document there's a line item that says,

09:45:08 15 "And/or commissions based of web revenues, 3/15 to 4/15."

09:45:15 16 Do you see that?

09:45:16 17 A. I do.

09:45:19 18 Q. Can you explain to me what that refers to?

09:45:27 19 A. Rhonda had drafted an agreement with me to pay a

09:45:31 20 percentage of the sales from The Secret web site, and as

09:45:45 21 soon as those sales began to occur, I included this line

09:45:52 22 item in my invoice because it was due to be paid based on

09:46:03 23 my agreement with Rhonda.

09:46:09 24 Q. And this was due to be paid for services that

09:46:11 25 you provided to The Secret?

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09:48:00 1 to the nature of the contract, which, as I understood it,  
09:48:06 2 it would not. I would ask you to rephrase it. My  
09:48:06 3 objection is as to the form of the question because that's  
09:48:09 4 what I understood you to be asking.

09:48:11 5 BY MR. CEDILLO:

09:48:11 6 Q. Has there been a dispute regarding whether or  
09:48:14 7 not you were owed those commissions?

09:48:24 8 A. The dispute has been not -- my understanding of  
09:48:29 9 the dispute hasn't been whether I'm owed the commissions,  
09:48:32 10 the dispute is whether they feel that -- how can I word  
09:48:44 11 it? There is a dispute over these commissions.

09:48:53 12 MR. PARKER: That's an answer.

09:48:56 13 BY MR. CEDILLO:

09:48:56 14 Q. Okay. And just again to clarify, these  
09:48:59 15 commissions are related to the services you were providing  
09:49:02 16 to The Secret?

09:49:03 17 THE WITNESS: Can you ask it again?

09:49:05 18 MR. CEDILLO: Can you read it back?

09:49:13 19 (Question read.)

09:49:14 20 THE WITNESS: That is correct.

09:49:14 21 (Exhibit Number 7 was marked for  
09:49:16 22 identification.)

09:49:16 23 BY MR. CEDILLO:

09:49:43 24 Q. This is a document labeled TS 00019.

09:49:47 25 Mr. Hollings, can you describe this document?

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09:50:01 1 A. This is an invoice from me to The Secret with a  
09:50:05 2 note at the top asking them -- or reminding them that I  
09:50:16 3 had not received the last month's payment.

09:50:23 4 Q. Did you receive that payment?

09:50:27 5 A. Are you referring to the past-due payment?

09:50:32 6 Q. The one that you described in the e-mail at the  
09:50:34 7 top.

09:50:34 8 A. Yes, I did eventually receive it.

09:50:37 9 Q. Okay. Do you know if you received payment of  
09:50:41 10 the invoice at the bottom on the page?

09:50:48 11 A. There were many invoices that were late, so  
09:50:54 12 without looking at my records or the next invoice I  
09:50:57 13 couldn't say if this one was paid on time, but it was  
09:51:03 14 paid.

09:51:04 15 Q. Okay. And this says, "Invoice 00008"; is that  
09:51:15 16 correct?

09:51:15 17 A. Correct.

09:51:16 18 Q. This invoice contains a line item for  
09:51:21 19 reimbursement, PRweb press release for \$240; is that  
09:51:27 20 correct?

09:51:27 21 A. Correct.

09:51:28 22 Q. Can you describe what that line item was for?

09:51:33 23 A. There was a press release that was published  
09:51:42 24 through PRweb, which I paid for, so therefore I invoiced  
09:51:50 25 for it to be reimbursed.

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09:51:54 1 Q. Were you reimbursed for it?

09:51:56 2 A. Yes.

09:51:57 3 Q. And you drafted this invoice?

09:52:01 4 A. Yes.

09:52:03 5 Q. And you included a Chicago address for The  
09:52:13 6 Secret LLC; is that correct?

09:52:15 7 A. That's correct.

09:52:19 8 MR. PARKER: Counsel, just so our record is  
09:52:22 9 clear, each of those documents you're handing him you're  
09:52:25 10 also having the court reporter mark as an exhibit;  
09:52:28 11 correct?

09:52:28 12 MR. CEDILLO: That's correct.

09:52:28 13 MR. PARKER: And just so I'm up to speed, this  
09:52:32 14 last document, TS 00019, is Exhibit 7?

09:52:40 15 THE COURT REPORTER: Yes.

09:52:40 16 MR. CEDILLO: I'm glad someone is keeping track.

09:52:43 17 MR. PARKER: I'm not very good at it, that's why  
09:52:45 18 I asked.

09:52:47 19 MR. CEDILLO: Thank you.

09:52:48 20 MR. PARKER: Sure.

09:52:48 21 (Exhibit Number 8 was marked for  
09:53:14 22 identification.)

09:53:14 23 BY MR. CEDILLO:

09:53:15 24 Q. I'm handing you a document labeled TS 00020,  
09:53:22 25 which I believe is Exhibit 8. Can you describe this

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09:53:31 1 document, please.

09:53:34 2 A. This is an invoice from me to The Secret and it  
09:53:37 3 has a note at the top asking when the accounting would be

09:53:44 4 done on the commissions that were due, and it also

09:53:52 5 mentions that there was a separate e-mail regarding Google

09:54:00 6 ads.

09:54:14 7 Q. What's the invoice number?

09:54:17 8 A. 00009.

09:54:20 9 Q. For what month?

09:54:22 10 A. June 2006.

09:54:25 11 Q. You prepared the invoice?

09:54:27 12 A. Yes.

09:54:28 13 Q. And in June of 2006, you still included a

09:54:40 14 Chicago address for The Secret LLC?

09:54:43 15 A. Yes.

09:54:43 16 Q. Did you have any reason at that point in time to  
09:54:50 17 think that The Secret was not located in Chicago?

09:54:57 18 A. My understanding is that 1339 West George Street  
09:55:02 19 was Bob Rainone's home.

09:55:09 20 Q. And this is where you addressed your invoices?

09:55:17 21 A. Yes.

09:55:29 22 Q. And this invoice was paid; correct?

09:55:32 23 A. Yes.

09:55:33 24 Q. I think I already asked that question, I'm

09:55:36 25 sorry. I interrupted you. It was paid?

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09:55:40 1 A. Yes.

09:55:40 2 Q. Thank you. I'm sorry. I'll hand you a document  
09:56:12 3 labeled TS 00023, which we'll mark as Exhibit 9.

09:56:12 4 (Exhibit Number 9 was marked for  
09:56:24 5 identification.)

09:56:24 6 BY MR. CEDILLO:

09:56:24 7 Q. Can you describe this document, please.

09:56:29 8 A. This is an invoice from me to The Secret with a  
09:56:35 9 note at the top saying that the Google expense report had  
09:56:38 10 been sent separately.

09:56:41 11 Q. And you drafted this invoice?

09:56:43 12 A. Yes.

09:56:47 13 Q. What's the date of the e-mail?

09:56:54 14 A. The date of the e-mail is September 7th, 2006.

09:57:04 15 Q. And so by this time, you had been working for  
09:57:10 16 The Secret for almost a year; is that correct?

09:57:14 17 A. That is correct.

09:57:16 18 Q. And this invoice, like the others we've looked  
09:57:22 19 at, you drafted?

09:57:31 20 A. I'm sorry, can you repeat the last question?

09:57:34 21 Q. Sure.

09:57:34 22 A. Okay.

09:57:35 23 Q. You drafted this invoice?

09:57:43 24 A. Okay. I'm sorry, I had a problem with the

09:57:46 25 previous question is why I'm having trouble with this one.

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09:57:48 1 When you said I was working for them, I was never employed  
09:57:52 2 by them, I was consulting for them.

09:57:55 3 Q. Providing services to them?

09:57:57 4 A. Yes.

09:57:57 5 Q. Okay.

09:57:58 6 A. So now back to this question.

09:58:00 7 Q. So you had been providing services to them for  
09:58:04 8 about a year at that point?

09:58:05 9 A. Correct.

09:58:06 10 Q. Okay. And even a year later, your invoice --  
09:58:17 11 strike that.

09:58:17 12 You drafted this invoice; correct?

09:58:19 13 A. Yes.

09:58:20 14 Q. Like the others?

09:58:21 15 A. Yes.

09:58:21 16 Q. And a year later, you were still including the  
09:58:24 17 Chicago address for The Secret LLC; is that correct?

09:58:27 18 A. Yes.

09:58:28 19 Q. Okay. You stated that these invoices generally  
09:58:38 20 were paid; is that accurate?

09:58:41 21 A. Yes.

09:58:46 22 Q. How were they paid to you? For example, were  
09:58:59 23 you sent a check, were you wired money? How were these  
09:59:08 24 invoices paid to you? How did you receive the funds?

09:59:11 25 A. The first invoice was wired.

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09:59:13 1 Q. Okay.

09:59:14 2 A. From Australia. And my recollection is that  
09:59:25 3 future payments came by check.

09:59:43 4 Q. Always?

09:59:48 5 A. Always check.

09:59:56 6 Q. Do you recall if those checks contained an  
10:00:01 7 address for the account holder?

10:00:07 8 A. I can't recall what was on the checks.

10:00:10 9 Q. You cashed them?

10:00:12 10 A. Yes.

10:00:12 11 Q. I'm handing you a document labeled TS 00024,  
10:00:29 12 which will be Exhibit 10.

10:00:29 13 (Exhibit Number 10 was marked for

10:00:35 14 identification.)

10:00:35 15 BY MR. CEDILLO:

10:00:36 16 Q. Can you describe this document, please.

10:00:44 17 A. It looks like a photocopy of a handwritten  
10:00:51 18 check.

10:01:07 19 Q. Do you see in what appears to be the memo line  
10:01:11 20 on the check some writing there?

10:01:18 21 A. Yeah. Barely, yes.

10:01:22 22 Q. Can you make that out, to the best of your  
10:01:25 23 ability?

10:01:31 24 A. There's a word and then after that numbers. The  
10:01:36 25 number is 00006.



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10:01:39 1 Q. Okay.

10:01:40 2 A. I can't make out the word.

10:01:42 3 Q. Okay. Is it possible that it says I-N-V?

10:01:53 4 A. It's possible, but it's also possible that it's  
10:01:57 5 T-H-U.

10:01:58 6 Q. Would that make sense if it said I-N-V?

10:02:02 7 MR. PARKER: Object to the form.

10:02:03 8 You can answer if you can.

10:02:06 9 THE WITNESS: I'm sorry, the question?

10:02:07 10 BY MR. CEDILLO:

10:02:08 11 Q. Okay. We'll strike the question. What is the  
10:02:10 12 amount of the check?

10:02:14 13 A. \$8,470 and no cents.

10:02:22 14 Q. And the check is made out to whom?

10:02:24 15 A. Dan Hollings.

10:02:26 16 Q. And that would be you?

10:02:28 17 A. Yes.

10:02:28 18 Q. And can you read for me the entity from whom the  
10:02:42 19 check had been made out in the top left?

10:02:46 20 A. The Secret LLC.

10:02:52 21 Q. Does it have an address?

10:02:54 22 A. Yes.

10:03:00 23 Q. Can you read the address, please?

10:03:02 24 A. 1339 West George Street, Chicago, Illinois. The  
10:03:10 25 zip code is blurred. I think it's 60657-4101.

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10:03:19 1 Q. Okay. Can you turn back, please, to what we  
10:03:22 2 marked as Exhibit 5, which is also labeled TS 00016.

10:03:45 3 A. Okay.

10:03:47 4 Q. Do you see that this is labeled Invoice 00006?

10:03:52 5 A. I see that.

10:03:53 6 Q. And that the total due listed on this invoice is  
10:04:01 7 \$8,470?

10:04:03 8 A. Yes.

10:04:04 9 Q. And that's the same amount that this check is  
10:04:06 10 for?

10:04:08 11 A. That's true.

10:04:13 12 Q. And is it true that the address listed on the  
10:04:16 13 invoice for The Secret LLC is the same as the address  
10:04:20 14 listed on the check paying you \$8,470?

10:04:37 15 A. They are the same, except that the check has the  
10:04:43 16 10-digit zip code.

10:04:46 17 Q. But aside from the 10-digit zip code, the  
10:04:50 18 addresses are the same?

10:04:51 19 A. Correct.

10:04:58 20 Q. So you were paid with a check that listed the  
10:05:04 21 payer as being in Chicago, Illinois; is that correct?

10:05:10 22 A. The check is from The Secret and the address is  
10:05:14 23 Chicago, Illinois.

10:05:19 24 Q. And you cashed this check?

10:05:24 25 A. Yes.

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10:05:25 1 Q. Is it possible that, over the course of your  
10:05:35 2 time providing services for The Secret, that anyone else  
10:05:43 3 deposited these checks? Let me rephrase the question.  
10:05:47 4 Did you generally deposit these checks into a bank?

10:05:55 5 A. Yes, I deposited them into a bank.

10:05:58 6 Q. So you didn't necessarily, for example,  
10:06:09 7 negotiate them with another individual?

10:06:10 8 A. No.

10:06:11 9 Q. Okay. Are you the only one who ever deposited  
10:06:17 10 checks from The Secret LLC into a bank account?

10:06:20 11 A. Yes.

10:06:32 12 Q. Are you generally the only person who deposits  
10:06:35 13 checks into your bank account?

10:06:36 14 A. Yes.

10:06:45 15 MR. CEDILLO: Would you like to take a break?

10:06:46 16 MR. PARKER: Sure. That's fine.

10:06:49 17 (A recess took place from 10:06 a.m. to

10:12:03 18 10:12 a.m.)

10:12:54 19 BY MR. CEDILLO:

10:13:32 20 Q. I'm going to hand you a document labeled TS  
10:13:39 21 00025, 26 and 27. These pages which will be Exhibit  
10:13:45 22 Number 11.

10:13:51 23 (Exhibit Number 11 was marked for  
10:14:12 24 identification.)

10:14:12 25 BY MR. CEDILLO:

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10:14:12 1 Q. Can you identify the documents for me, please?

10:14:17 2 A. I'm sorry, was that a question to me?

10:14:19 3 Q. Yes. Can you please identify the documents?

10:14:26 4 Describe them however you will.

10:14:28 5 A. As a set or each one individually?

10:14:30 6 Q. Each one, please.

10:14:33 7 A. The first one looks like a 2006 1099

10:14:44 8 miscellaneous income tax form with a payer's name listed

10:14:57 9 as The Secret LLC and the recipient is me.

10:15:04 10 Q. Does the payer's name have an address?

10:15:07 11 A. Yes.

10:15:09 12 Q. Is that a Chicago address?

10:15:11 13 A. Yes.

10:15:11 14 Q. The same address that you included on your

10:15:14 15 invoices to The Secret?

10:15:25 16 A. Yes.

10:15:31 17 Q. And the next page, TS 00026?

10:15:40 18 A. This appears to be a 2007 1099 miscellaneous

10:15:50 19 income tax form with the payer's name listed as TS

10:15:57 20 Merchandising, LTD and the recipient's name is me.

10:16:06 21 Q. Does the payer's name have a Chicago address?

10:16:09 22 A. Yes.

10:16:14 23 Q. So you had been paid by an entity located in

10:16:19 24 Chicago, at least according to this 1099?

10:16:26 25 A. According to this 1099, a different entity this

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10:16:33 1 time.

10:16:33 2 Q. Yes, but in Chicago nevertheless; correct?

10:16:36 3 A. It is in Chicago, yes.

10:16:38 4 Q. Okay. Will you turn to the next page, please,

10:16:42 5 TS 00027?

10:16:48 6 A. Okay.

10:16:50 7 Q. Can you describe this?

10:16:56 8 A. This is a 2007 1099 miscellaneous tax income

10:17:08 9 form with the payer's name listed as TS Merchandising LTD

10:17:13 10 and the recipient's name is me. My name is spelled wrong,

10:17:21 11 but it's me.

10:17:24 12 Q. Under the name it says, "Dan Holland,"

10:17:30 13 H-O-L-L-A-N-D; is that correct?

10:17:30 14 A. It says that. That's not how you spell my name,

10:17:34 15 but --

10:17:34 16 Q. Okay. And it also says, under recipient's name,

10:17:39 17 "Web Services LLC"; is that correct?

10:17:42 18 A. That is correct.

10:17:42 19 Q. Can you identify what Web Services LLC is?

10:17:47 20 A. That is my company.

10:17:56 21 Q. When did you form -- did you form this company?

10:17:59 22 A. I did.

10:17:59 23 Q. When?

10:18:03 24 A. I don't recall the date.

10:18:11 25 Q. Was it in 2006? In that year at least?

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10:18:19 1 A. Yes.

10:18:20 2 Q. Is it approximately in September of 2006?

10:18:32 3 A. I know it was toward the end of that year. I  
10:18:35 4 don't remember the month.

10:18:35 5 Q. Okay. Before the year 2007, TS Merchandising  
10:18:48 6 located in Chicago had paid Web Services LLC \$20,000,  
10:18:58 7 according to this 1099; is that right?

10:19:01 8 A. That's correct.

10:19:04 9 Q. Why would it be paying money to Web Services  
10:19:18 10 LLC?

10:19:18 11 A. Because once I established Web Services LLC, at  
10:19:27 12 the recommendation of The Secret, I began to invoice under  
10:19:33 13 my company name and so therefore they paid.

10:19:47 14 Q. So, if I understand correctly, Web Services LLC  
10:19:52 15 was invoicing The Secret for your services; is that right?

10:20:00 16 A. Restate that.

10:20:02 17 MR. CEDILLO: Can you read back the question.

10:20:13 18 (Question read.)

10:20:14 19 THE WITNESS: That is correct.

10:20:22 20 BY MR. CEDILLO:

10:20:22 21 Q. And these invoices, were they sent to the same  
10:20:27 22 address as the invoices we reviewed previously in the  
10:20:31 23 deposition?

10:20:33 24 A. No.

10:20:34 25 Q. Where were they sent?

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10:20:38 1 A. Based on what I see here, they were sent to 1550  
10:20:48 2 North Cleveland Avenue, Chicago, Illinois 60010. Whereas  
10:20:57 3 earlier, we had 1339 West George Street, Chicago, Illinois  
10:21:06 4 60657.

10:21:08 5 Q. Okay.

10:21:08 6 A. And prior to that, we had Australia.

10:21:21 7 Q. But from at least November 2005 through February  
10:21:38 8 2007, you were sending invoices to a Chicago address; is  
10:21:46 9 that correct?

10:21:46 10 A. I believe so.

10:21:50 11 Q. And these invoices were paid?

10:21:53 12 A. They were paid.

10:22:06 13 Q. And they were paid by check like Exhibit 10; is  
10:22:13 14 that right?

10:22:13 15 A. I was paid by check. Except for the first one  
10:22:18 16 which was wired.

10:22:19 17 Q. Okay. But the others were paid by check?

10:22:23 18 A. Correct.

10:22:24 19 Q. Do you recall if the checks, besides Exhibit 10,  
10:22:37 20 also contained a -- also bore a Chicago address for the  
10:22:41 21 payer?

10:22:42 22 A. I have no idea.

10:22:43 23 Q. Okay. You mentioned that you established Web  
10:23:06 24 Services at the recommendation of someone; is that right?

10:23:10 25 A. That's correct.

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10:26:49 1 A. I likely used Dan@Hollings.name N-A-M-E.

10:26:55 2 Q. Okay. Any others?

10:26:59 3 A. Unlikely.

10:27:11 4 Q. So if we saw e-mails with that e-mail address in  
10:27:14 5 the from line, they came from you?

10:27:20 6 MR. PARKER: What address are you talking about?

10:27:22 7 BY MR. CEDILLO:

10:27:23 8 Q. Dan@Hollings.name?

10:27:26 9 A. That is my e-mail address.

10:27:27 10 Q. Okay. And generally, e-mails with that address  
10:27:34 11 in the from line come from you?

10:27:38 12 A. Yes, they come from me.

10:27:39 13 Q. Okay. Have you ever known them to come from  
10:27:46 14 anyone else?

10:27:47 15 A. No.

10:28:01 16 Q. You mentioned earlier that you deposited checks  
10:28:11 17 received as payment for invoices that you sent for your  
10:28:16 18 services; is that correct?

10:28:17 19 A. Yes.

10:28:22 20 Q. Did you deposit them into one of the bank  
10:28:25 21 accounts you described at the beginning of the deposition?

10:28:28 22 A. Yes.

10:28:30 23 Q. Do you know which one?

10:28:34 24 A. I can't recall.

10:28:36 25 Q. But it was either the Chase bank account or the



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10:28:41 1 Bank of America account?

10:28:43 2 A. Correct.

10:28:43 3 Q. And these were joint accounts that you hold with  
10:28:50 4 your wife?

10:28:58 5 A. My Bank of America is joint, my Web Services LLC  
10:29:07 6 is not.

10:29:13 7 Q. So Web Services has its own bank account?

10:29:19 8 A. Correct.

10:29:22 9 Q. Where is that located or with what bank?

10:29:26 10 A. Chase.

10:29:36 11 Q. Before you created Web Services LLC, did you  
10:29:42 12 have the Chase account?

10:29:47 13 A. No.

10:29:48 14 Q. So checks you received for your services to The  
10:29:55 15 Secret before you created Web Services LLC, those would  
10:30:00 16 have been deposited into the Bank of America account; is  
10:30:04 17 that correct?

10:30:04 18 A. I had a Chase account prior to Web Services, so  
10:30:20 19 you would have to ask that question again for me to answer  
10:30:23 20 it correctly.

10:30:23 21 Q. Okay. I believe you testified earlier that you  
10:30:50 22 formed Web Services LLC at the end of 2006 approximately?

10:30:54 23 A. Yes.

10:31:02 24 Q. For example, Exhibit 10, which is TS 00024,  
10:31:09 25 which is a check in the amount of \$8,470, you said that

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10:41:47 1 Services LLC; is that correct?

10:41:47 2 A. Yes.

10:41:48 3 Q. Are there any other members for Web Services  
10:41:51 4 LLC?

10:41:51 5 A. No.

10:41:53 6 Q. Any officers?

10:41:56 7 A. No.

10:41:57 8 Q. Directors?

10:41:58 9 A. No.

10:42:05 10 Q. Employees?

10:42:06 11 A. No.

10:43:06 12 Q. I'm going to take you back one more time to

10:43:13 13 Exhibit 11, hopefully this will be the last time, which is

10:43:19 14 the 1099s. If you look at page TS 00025, do you see a

10:43:31 15 telephone number under the address for the payer?

10:43:37 16 A. I do.

10:43:51 17 Q. Do you recognize that area code as designating

10:43:54 18 any particular area?

10:43:57 19 A. No.

10:43:58 20 Q. Did you ever call anyone using that area code?

10:44:05 21 A. I cannot recall.

10:44:06 22 Q. Did you ever call Bob Rainone at any number  
10:44:14 23 using that area code?

10:44:15 24 A. I called Bob. I can't recall area codes.

10:44:32 25 Q. The area code is 773; is that correct?

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10:44:34 1 A. The area code on this document is 773.

10:44:37 2 Q. Okay. And the address for that payer is  
10:44:42 3 Chicago, Illinois; correct?

10:44:45 4 A. Correct.

10:45:12 5 Q. And you mentioned that this address 1339 West  
10:45:16 6 George Street, Chicago, Illinois 60657, you thought was  
10:45:21 7 Bob Rainone's home address; is that right?

10:45:25 8 A. I believe it was.

10:45:45 9 Q. Did you ever have any other contacts with Google  
10:45:48 10 on behalf of The Secret? I'm sorry, strike that.

10:45:58 11 You described earlier administering the Google  
10:46:05 12 AdWords program in connection with your services. Were  
10:46:08 13 there any other contacts with Google besides the AdWord  
10:46:15 14 program in connection with your services for The Secret?

10:46:36 15 A. Just a minute.

10:46:38 16 Q. Uh-huh.

10:46:43 17 A. Yes.

10:46:47 18 Q. Did any of them involve claims of copyright  
10:46:57 19 infringement of copyright to The Secret?

10:47:11 20 A. I'm not sure I can answer that question, but it  
10:47:15 21 involved unknown people were taking The Secret movie or  
10:47:37 22 portions of The Secret movie and posting them on Google  
10:47:42 23 video or other Google video services.

10:47:50 24 Q. Uh-huh.

10:47:54 25 A. And I would send requests to Google for the

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10:48:00 1 removal of those videos.

10:48:02 2 Q. Okay. Did you have to do that often?

10:48:08 3 A. Yes.

10:48:10 4 Q. Can you give any estimate of how many times?

10:48:28 5 A. It's been a while, but my guesstimate, as best I  
10:48:35 6 can recall, would be perhaps 30 times.

10:48:41 7 Q. Okay. Did you have to follow any particular  
10:48:44 8 protocol when you notified Google about these unknown  
10:48:50 9 folks posting unauthorized video?

10:48:55 10 A. Google has a procedure for that which requires  
10:48:59 11 that you fax the web address of where the video is  
10:49:07 12 appearing on their servers along with a few other  
10:49:21 13 criteria. There's a document on the Google site which  
10:49:24 14 tells how to submit such a request and I would follow that  
10:49:28 15 protocol.

10:49:29 16 Q. Okay. And when you contacted Google following  
10:49:36 17 that protocol, you were doing it on behalf of The Secret;  
10:49:41 18 is that correct?

10:49:48 19 A. That is correct.

10:49:54 20 Q. As part of the services that you were providing  
10:49:59 21 to them; is that right?

10:50:00 22 A. That is correct.

10:50:04 23 Q. I'm handing to you a document labeled TS 00006,  
10:50:14 24 Exhibit Number 13.

10:50:14 25 (Exhibit Number 13 was marked for

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10:50:22 1 identification.)

10:50:22 2 BY MR. CEDILLO:

10:50:23 3 Q. I'll represent that it's an e-mail from Dan

10:50:26 4 Hollings, DHollings@mac.com sent Sunday, February 11th,

10:50:35 5 2007. Is this representative of the kinds of faxes that

10:50:42 6 you were referring to just a moment ago?

10:50:46 7 A. Yes.

10:51:01 8 Q. Can you explain what it says in the note which

10:51:05 9 is the first line of the e-mail, the text of the e-mail?

10:51:10 10 A. The note states, "This is about the sixth time

10:51:13 11 this group has reposted within a frame-set using Google to

10:51:17 12 deliver the movie to their site," and then the web address

10:51:24 13 of thescienceofgettingrich.biz is shown.

10:51:33 14 Q. So whoever was responsible for this web site,

10:51:38 15 thescienceofgettingrich.biz, was posting certain

10:51:46 16 proprietary materials without authorization; is that an

10:51:51 17 accurate description?

10:51:57 18 A. Yes. I can't at this point remember exactly

10:52:01 19 what -- you know, exactly what they were posting, but it

10:52:09 20 was obviously a movie or a portion of the movie.

10:52:13 21 Q. Okay. And you said earlier that you sent these

10:52:20 22 notices to Google as part of the services that you

10:52:26 23 provided to The Secret; correct?

10:52:28 24 A. Correct.

10:52:29 25 Q. And you sent them on behalf of The Secret?

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10:52:33 1 A. That is correct.

10:52:35 2 Q. Can you read what it says at the Number 1?

10:52:42 3 A. "The following video is a fully copyright

10:52:45 4 production of PrimeTime Productions and The Secret LLC

10:52:50 5 based at the following location."

10:52:52 6 Q. What's the location?

10:52:54 7 A. The Secret LLC, Post Office Box 578010 Chicago,

10:53:01 8 Illinois 60657. And then there's a link to the video on

10:53:09 9 Google.

10:53:10 10 Q. Okay. So even when were you dealing with

10:53:16 11 Google, you represented to them that you were sending this

10:53:21 12 on behalf of an entity located in Chicago, Illinois?

10:53:26 13 A. Yes. This information was provided to me by

10:53:30 14 either Rhonda or Paul. They were generally the people

10:53:36 15 that provided this. And then I would just stick it into

10:53:40 16 Google's form.

10:53:42 17 Q. Okay.

10:53:42 18 A. Much of the wording on this is Google's form.

10:53:46 19 Q. But you included The Secret LLC with the Chicago

10:53:50 20 address; is that right?

10:53:52 21 A. Yes. I would have copied and pasted that in,

10:53:57 22 yes.

10:53:57 23 Q. And you did this about 30 times?

10:54:02 24 A. Yeah. 30 times, I would say, is the max. It

10:54:04 25 would be 30 or somewhere under there, best guess.

Hollings, Dan (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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10:54:20 1 Q. Did you ever send similar notices to any other  
10:54:24 2 web sites like Google?

10:54:29 3 A. Not that I recall.

10:54:31 4 Q. Anything to sites like You Tube, for example?

10:54:40 5 A. Not that I recall.

10:54:43 6 Q. Maybe Yahoo.com?

10:54:46 7 A. No.

10:55:19 8 MR. CEDILLO: Why don't we take a break and I'll  
10:55:21 9 be done in about maybe a half hour after that, if that's  
10:55:27 10 all right?

10:55:27 11 MR. PARKER: That's fine.

10:55:29 12 (A recess took place from 10:55 a.m. to

11:02:27 13 11:02 a.m.)

11:02:39 14 BY MR. CEDILLO:

11:02:42 15 Q. Mr. Hollings, you mentioned a while ago that the  
11:02:51 16 Web Services account at Chase, you may have recently  
11:02:59 17 changed it to provide access for your wife to that account  
11:03:03 18 in case of your demise; is that correct?

11:03:05 19 A. Yes.

11:03:08 20 Q. So do you continue to earn money through Web  
11:03:23 21 Services LLC, through that company?

11:03:23 22 A. I do.

11:03:24 23 Q. And would it be correct to say that the money  
11:03:26 24 you make through Web Services is ultimately for the  
11:03:30 25 benefit of your wife?

Canyon State Reporting

Phone: 602.277.8882

Fax: 602.277.5576

Hollings, Dan (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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11:03:39 1 A. That's a vague question. I mean, it's for the  
11:03:42 2 benefit of my family. This is my livelihood.

11:03:45 3 Q. But in the case of your demise, you would like  
11:03:48 4 her to have access to the money you've earned through Web  
11:03:51 5 Services.

11:03:51 6 A. Yes. We have a -- I don't remember the  
11:03:54 7 specifics of how it's set up, but we have a will and a  
11:03:57 8 trust set up which includes my wife and daughter.

11:04:00 9 Q. Okay. You said this is your livelihood; is that  
11:04:30 10 correct?

11:04:30 11 A. Internet strategy and internet consultation,  
11:04:35 12 marketing consultation, that's what I do for a living.

11:04:38 13 Q. The same kind of services you were providing to  
11:04:41 14 The Secret?

11:04:42 15 A. Correct.

11:04:43 16 Q. Okay. That's what you do to support your  
11:04:48 17 family?

11:04:49 18 A. That's what I do to support my family, yes.

11:04:53 19 Q. Okay. So the money you earn providing those  
11:05:01 20 services pays your family's bills?

11:05:08 21 A. Correct.

11:05:10 22 Q. Like your mortgage?

11:05:15 23 A. Correct.

11:05:20 24 Q. Phone bills?

11:05:22 25 A. Correct.

Canyon State Reporting

Phone: 602.277.8882

Fax: 602.277.5576



Hollings, Dan (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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11:05:48 1 Q. Other household expenses?

11:05:55 2 A. Correct.

11:06:05 3 Q. Does your family have other sources of income

11:06:08 4 besides the services you provide through Web Services LLC?

11:06:20 5 A. No.

11:06:32 6 Q. Have you ever heard of something called The

11:06:38 7 Secret Symphony?

11:06:38 8 A. Yes.

11:06:38 9 Q. Can you tell me what that is or was?

11:06:44 10 A. That is a four piece -- I mean, four -- yeah,

11:06:53 11 four piece musical composition which I wrote.

11:07:07 12 Q. And just for the record, have you changed the

11:07:20 13 name of that piece?

11:07:23 14 A. Yes, I did change the name of it.

11:07:26 15 Q. Okay. And have you offered that composition for

11:07:58 16 sale?

11:07:59 17 A. Yes.

11:08:04 18 Q. By what medium, can you tell me?

11:08:11 19 A. It's available for sale on CD.

11:08:15 20 Q. Okay. Is it accurate to say that this

11:08:29 21 composition was inspired by The Secret?

11:08:34 22 A. I originally wrote it as a tribute to The

11:08:39 23 Secret.

11:08:39 24 Q. Okay. And did you write it after you became --

11:08:41 25 or rather, after you were engaged to provide web

Hollings, Dan (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

Page 62

11:10:53 1 allegations relating to this CD, but I don't see how that  
11:10:57 2 question gets to any jurisdictional issue. You can ask  
11:11:01 3 him where he sent them, which you've done. But the  
11:11:04 4 purpose behind it, I fail to see how it's relevant to the  
11:11:15 5 inquiry we're here for today.

11:11:15 6 MR. CEDILLO: Okay. Can you repeat the last  
11:11:24 7 question.

11:11:33 8 (Question read.)

11:11:34 9 MR. PARKER: Same objection. Absent some tie  
11:11:41 10 into any of the jurisdictional issues, I'm going to  
11:11:45 11 instruct him not to answer.

11:12:04 12 BY MR. CEDILLO:

11:12:05 13 Q. You're confident that you never sent any CDs to  
11:12:09 14 Chicago?

11:12:10 15 A. I'm absolutely sure of that.

11:12:30 16 Q. Did you ever travel to Chicago in connection  
11:12:33 17 with your work for The Secret?

11:12:37 18 A. One time.

11:12:43 19 Q. Approximately when?

11:12:52 20 A. Very near the end of my consultation with The  
11:13:00 21 Secret. I believe in December of 2006.

11:13:21 22 Q. And what about your work for The Secret brought  
11:13:24 23 you there?

11:13:26 24 A. Bob Rainone had requested I come for a meeting  
11:13:38 25 there that he was orchestrating.

Hollings, Dan (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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11:13:43 1 Q. What was the meeting about?

11:13:55 2 A. Future plans of where The Secret would be going  
11:14:02 3 in the coming year, what they would be doing.

11:14:08 4 Q. Why did you need to be there?

11:14:16 5 A. You would have to ask Bob Rainone that.

11:14:19 6 Q. Why did you go?

11:14:20 7 A. Pardon me?

11:14:21 8 Q. Why did you go?

11:14:24 9 A. Because I was providing services for them as a  
11:14:27 10 client and expected to continue to provide services and  
11:14:33 11 Bob said that we would be talking about things that we  
11:14:38 12 would be doing in the coming year, so it behooved me to  
11:14:46 13 accept his invitation.

11:14:48 14 Q. So it was related to the work that you had been  
11:14:52 15 doing for The Secret?

11:14:53 16 A. Yes, it was related to work for The Secret.

11:14:59 17 Q. Did you, in fact, draft an agenda for that  
11:15:09 18 meeting in December of 2006 in Chicago?

11:15:13 19 A. I think I sent an e-mail suggesting some topics  
11:15:18 20 and things that I would like to see included in the  
11:15:26 21 agenda, but I believe that Bob actually drafted the  
11:15:30 22 agenda.

11:15:36 23 Q. But you made your suggestions?

11:15:39 24 A. Yes, I made suggestions.

11:15:49 25 Q. Did you object when Bob told you that you needed

Hollings, Dan (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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11:15:54 1 to come to Chicago for this meeting as distinguished from  
11:16:02 2 somewhere else?

11:16:03 3 A. Actually, I did, yes.

11:16:05 4 Q. But you went anyway?

11:16:07 5 A. I went anyway.

11:16:22 6 Q. No one forced you to go, did they?

11:16:27 7 MR. PARKER: Object to the form.

11:16:29 8 You can answer it, if you can.

11:16:40 9 THE WITNESS: That's an unusual question. I  
11:16:50 10 felt obligated to go in order to provide services for the  
11:16:55 11 client.

11:16:57 12 BY MR. CEDILLO:

11:16:58 13 Q. And ultimately, it would be to your benefit if  
11:17:01 14 you went; correct?

11:17:05 15 MR. PARKER: Same objection.

11:17:08 16 THE WITNESS: There was nothing covered in the  
11:17:10 17 meeting that couldn't have been done by telephone or  
11:17:13 18 e-mail.

11:17:15 19 BY MR. CEDILLO:

11:17:15 20 Q. But you went anyway?

11:17:16 21 A. I went anyway.

11:18:14 22 Q. Just to wrap up, you named three cell phone  
11:18:21 23 numbers at the beginning of the deposition.

11:18:28 24 MR. PARKER: Cell phone or phone numbers?

11:18:30 25 MR. CEDILLO: I'm sorry. Thank you.

## EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
(EASTERN DIVISION)**

TS Merchandising Ltd., a British Virgin Islands corporation, and TS Production LLC, a Hungarian limited liability company,

Plaintiffs,

vs.

Dan and Loretta Hollings, Arizona residents, and Web Services, LLC, an Arizona limited liability company,

Defendants.

Case No. 07 C 6518

Hon. Ronald A. Guzman

**DECLARATION OF ROBERT E. RAINONE, JR., IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS FOR LACK OF JURISDICTION**

I, Robert E. Rainone, Jr., hereby submit this declaration in support of plaintiffs' response to defendants' motion to dismiss for lack of jurisdiction (Dkt. No. 21), and declare as follows:

1. I am presently a managing director of plaintiff TS Production LLC and have personal knowledge of the facts herein. I have resided in Chicago, Illinois for approximately 16 years, and I presently reside in Chicago, Illinois.

2. From approximately October 2005 through the date of this declaration, I have served as Chief Executive Officer of The Secret LLC (now known as TS RER LLC), which was an affiliate of plaintiff TS Merchandising Ltd. I was president of TS Merchandising Ltd. and was its primary operational executive from October 2005 through December 2006. The principal place of business for both entities is Chicago, Illinois.

3. From October 2005 through December 2006, I was responsible for overseeing distribution operations relating to the movie *The Secret*, including the use of the Web site located at <www.theseecret.tv> and other Internet-based means for disseminating information concerning *The Secret*.

4. In connection with his work on the Web site at <www.theseecret.tv> and other Internet-based activities on behalf of *The Secret*, defendant Dan Hollings made and received dozens of telephone calls to and from TS Merchandising representatives, including myself, located in Chicago, Illinois.

5. In connection with his work on the Web site at <www.theseecret.tv> and other Internet-based activities on behalf of *The Secret*, defendant Hollings also regularly sent over 1500 emails to TS Merchandising representatives, including myself, in Chicago, Illinois, throughout his tenure.

6. Furthermore, in connection with the services he was engaged to provide on behalf of *The Secret*, Hollings traveled to Chicago, Illinois in December 2006 to meet with TS Merchandising representatives, including myself, and others to discuss his engagement and Website operations going forward.

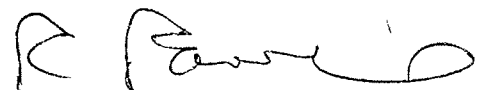
7. During his engagement, Hollings regularly invoiced The Secret LLC and subsequently TS Merchandising for his services. Both entities were located in Chicago, Illinois, and Hollings' invoices were sent to them there.

8. The Secret LLC and subsequently TS Merchandising paid Hollings invoices, some of which were issued in his own name, and others of which were issued in the name of Defendant Web Services LLC. These invoices were paid by check. These checks and the 1099 forms summarizing the payments made to Hollings or Web Services came from Chicago, Illinois and bore the Chicago, Illinois address of the entity paying his invoices. Copies of selected invoices and the checks paying them are attached to this declaration as Exhibit A.

I declare under penalty of perjury, that to the best of my knowledge and recollection, the foregoing is true and correct.

5-14-08

Date



Robert E. Rainone

EXHIBIT A



**Bob Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Monday, November 21, 2005 5:53 PM  
**To:** bob@rainone.org; Bob Rainone  
**Subject:** Invoice 00002 from Dan Hollings

**Dan Hollings**  
6370 Via Amable  
Tucson, AZ 85750  
520 299 5626

**Invoice 00002**

**The Secret LLC**  
1339 W. George Street  
Chicago, IL 60657  
773-296-9066

**21 Nov 2005**

Description	Price	Total
Web Services / Project Management	\$8,000.00	\$8,000.00

**Subtotal: \$8,000.00**  
**Total \$8,000.00**  
**Due:**

Invoice Terms: **Due 06 Dec 2005 (NET 15)**  
*All amounts are in U.S. Dollar.*

**Invoices summary page**

This invoice was created with Blinksale, the easiest way to send invoices online.

Page 1 of 1

Posting Date: 2005-12-23  
 Sequence #: 720686235  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$8000.00  
 Check/Serial #: 000000001006  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 4  
 ItemType: P  
 BOFD: 000000000

\*071000301\*  
 12/23/2005  
 6110246632

This is a LEGAL COPY of  
 your check. You can use it  
 the same way you would  
 use the original check.

12/22/2005  
 0325010295

THE SECRET LLC  
 1308 WEST GEORGE STREET  
 CHICAGO, IL 60607

MORGAN CHASE BANK, N.A.  
 CHICAGO, ILLINOIS 60670  
 3-1739

1006

12/18/2005

PAY TO THE  
 ORDER OF Dan Hollings

\$ \*\*8,000.00

Eight Thousand and 00/100

DOLLARS

Dan Hollings  
 6370 Via Amabile  
 Tucson, AZ 85730

MEMO

\*001006\* \*071000013\*

708710710\*

\*0000800000\*

\*001006\*

\*071000013\*

REDACTED

\*0000800000\*

12/2005  
 074909963

0720686235

0317892008

12232005

0710-0030-1

ENTP0619 TRC=C6517 PK=02

12/23/2005

0325010295

071000013

071000013

071000013

071000013

071000013

071000013

071000013

071000013

071000013

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0005 19528

Dan Hollings

\*071000301\* 12/23/2005  
 6110246632

Do not endorse or write below this line.

Page 1 of 1

**Bob Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Thursday, December 08, 2005 12:44 PM  
**To:** bob@rainone.org; Bob Rainone  
**Subject:** Invoice 00003 from Dan Hollings

**Dan Hollings**

6370 Via Amable  
Tucson, AZ 85750  
520 299 5626

**Invoice 00003****The Secret LLC**

1339 W. George Street  
Chicago, IL 60657  
773-296-9066

**08 Dec 2005**

Description	Price	Total
Web	\$8,000.00	\$8,000.00
Services /		
Project		
Management		

**Subtotal: \$8,000.00**  
**Total \$8,000.00**  
**Due:**

**THE SECRET LLC****1006**

Dan Hollings  
**Date**      **Type**      **Reference**  
12/08/200   Bill      Inv# 00003

Original Amt.	Balance Due	12/18/2005 Discount	Payment
8,000.00	8,000.00		8,000.00
	Check Amount		8,000.00 ✓

Bank One Checking

8,000.00

Page 1 of 1

Posting Date: 2006-02-08  
 Sequence #: 120590475  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$8508.00  
 Check/Serial #: 000000001014  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 4  
 ItemType: P  
 BOFD: 000000000

\*071000301\*  
 02/08/2006  
 6414652462

This is a LEGAL COPY of  
 your check. You can use it  
 the same way you would  
 use the original check.

02/07/2006  
 03250497795  
 1221017063

1014

THE SECRET LLC  
1308 WEST OGDON STREET  
CHICAGO, IL 60607

SPRINGFIELD CHASE BANK, N.A.  
CHICAGO, ILLINOIS 60676  
21-718

2/7/2006

PAY TO THE ORDER OF Dan Hollings \$ 8,508.00

Eight Thousand Five Hundred Eight and 00/100\*\*\*\*\* DOLLARS

Dan Hollings  
6370 Via Amabile  
Tucson, AZ 85750

MEMO

#001014# #071000013# 708710710# #0000850800#

#001014#

#071000013#

REDACTED

#0000850800#

02/08/06  
074909962

0120590475

0710-0030-1  
ENT=0072 TRC=06 TRK=03

02/07/2006  
03250497795

0314 77808

071000301\* 02/08/2006  
6414652462

Do not endorse or write below this line.

1014

Dan Hollings

Date 01/08/200  
Type Bill  
Reference Inv# 4

Original Amt.  
8,508.00


Balance Due 2/2/2006  
8,508.00

Check Amount

1014

Payment  
8,508.00  
8,508.00

Chase Checking

 ONLINE BUSINESS FORMS 1-800-326-0304 [www.onlineforms.com](http://www.onlineforms.com)

8,508.00



**Bob Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Sunday, January 08, 2006 6:38 PM  
**To:** Bob Rainone; dan@hollings.name  
**Subject:** Invoice 00004 from Dan Hollings

**Dan Hollings**  
6370 Via Amable  
Tucson, AZ 85750  
520 299 5626

**Invoice 00004**

**The Secret LLC**  
1339 W. George Street  
Chicago, IL 60657  
773-296-9066

**08 Jan 2006**

Description	Price	Total
Web Services / Project Management	\$8,000.00	\$8,000.00
Reimbursement; Marketing Costs (Google)	\$508.00	\$508.00

**Subtotal: \$8,508.00**  
**Total \$8,508.00**  
**Due:**

Invoice Terms: **Due 08 Jan 2006 (Immediate)**  
*All amounts are in U.S. Dollar.*

**Invoices summary page**

This invoice was created with Blinksale, the easiest way to send invoices online.

1/27/2006

Posting Date: 2006-03-14  
 Sequence #: 220048138  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$8487.00  
 Check/Serial #: 000000001019  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 4  
 ItemType: P  
 BOFD: 000000000

\*071000301\*  
 03/14/2006  
 6318641606

This is a LEGAL COPY of  
 your check. You can use it  
 the same way you would  
 use the original check.

122101706 03/13/2006  
 4121410550  
 1010101221

THE SECRET LLC  
 1338 WEST GEORGE STREET  
 CHICAGO, IL 60637

JPMORGAN CHASE BANK, N.A.  
 CHICAGO, ILLINOIS 60670  
 3-1-718

1019

2/8/2006

PAY TO THE  
 ORDER OF Dan Hollings

\$ 8,487.00

Eight Thousand Four Hundred Eighty Seven and 00/100 DOLLARS

Dan Hollings  
 6370 Via Amabile  
 Tucson, AZ 85730

MEMO

#001019# 4121410550

#0000848700#

REDACTED

REDACTED

#0000848700#

#001019#

4121410550

074909962  
 0220048138

1211557721  
 03147706  
 0710000001  
 ENT=0520 TRC=0476

122101706 03/13/2006  
 4121410550  
 1010101221

050141214

4121410550

Dan Hollings

\*071000301\*  
 03/14/2006  
 6318641606

Do not endorse or write below this line.

THE SECRET LLC

Dan Hollings


Date	Type	Reference
02/08/200	Bill	Inv #000005

1019

Original Amt.	2/8/2006
8,487.00	Discount
	Balance Due
	8,487.00
	Check Amount
	8,487.00

Payment
8,487.00
8,487.00

Chase Checking

 DELUXE BUSINESS FORMS 1-800-328-0304 www.deluxeforms.com

8,487.00



**Bob Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Wednesday, February 08, 2006 10:40 AM  
**To:** Bob Rainone; dan@hollings.name  
**Subject:** Invoice 00005 from Dan Hollings

**Dan Hollings**  
6370 Via Amable  
Tucson, AZ 85750  
520 299 5626

**Invoice 00005**

**The Secret LLC**  
1339 W. George Street  
Chicago, IL 60657  
773-296-9066

**08 Feb 2006**

Description	Price	Total
Web Services / Project Management	\$8,000.00	\$8,000.00
Reimbursement; Marketing Costs (Google)	\$487.00	\$487.00
<b>Subtotal:</b>	<b>\$8,487.00</b>	
<b>Total</b>	<b>\$8,487.00</b>	
<b>Due:</b>		

Invoice Terms: **Due 23 Feb 2006 (NET 15)**  
*All amounts are in U.S. Dollar.*

**Invoices summary page**

This invoice was created with Blinksale, the easiest way to send invoices online.

3/6/2006

\*071000301\*  
04/18/2006  
6612216866

This is a LEGAL COPY of  
your check. You can use it  
the same way you would  
use the original check.

04/17/2006  
055210057ED  
1221017061

THE SECRET LLC  
1339 W GEORGE ST  
CHICAGO, IL 60657-4101

02-7110/2710

501

4-12-06

PAY TO THE  
ORDER OF

Dan Hellings

Eighty four hundred seventy & 00/100

\$ 8470.00

diamond/bank

THU 000000

RE [Signature]

000501 02710711011

REDACTED

000008470000

000501

02710711011

REDACTED

000008470000

Serial 501 Amount 000008470.00 Date 04-19-2006

REDACTED



04/19/2006  
31861500

04/17/2006  
055210057ED  
1221017061

BANK OF AMERICA NA THE  
1221017061 031710471  
04/17/06  
3150012550

06 1800

DO NOT SIGN BELOW THIS LINE  
AND DO NOT WRITE OR SIGN BELOW THIS LINE

[Signature]

Do not endorse or write below this line.

\*071000301\* 04/18/2006  
6612216866

**Bob Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Thursday, March 09, 2006 9:32 AM  
**To:** Bob Rainone; dan@hollings.name  
**Subject:** Invoice 00006 from Dan Hollings

*pd 4-12 ok*

*# 501*

**Dan Hollings**  
6370 Via Amable  
Tucson, AZ 85750  
520 299 5626

## Invoice 00006

**The Secret LLC**  
1339 W. George Street  
Chicago, IL 60657  
773-296-9066

**09 Mar 2006**

Description	Price	Total
Web Services / Project Management	\$8,000.00	\$8,000.00
Reimbursement; Marketing Costs (Google)	\$470.00	\$470.00
<b>Subtotal:</b>	<b>\$8,470.00</b>	
<b>Total</b>	<b>\$8,470.00</b>	
<b>Due:</b>		

Invoice Terms: **Due 09 Mar 2006 (Immediate)**  
*All amounts are in U.S. Dollar.*

**Invoices summary page**

This invoice was created with Blinksale, the easiest way to send invoices online.

3/9/2006

**The Secret LLC**

Dan Hollings

Date 04/08/2008  
Type Bill  
Reference Inv# 00007HOriginal Amt.  
8,502.005/8/2006  
Balance Due Discount  
8,502.00

Check Amount

**1004**Payment  
8,502.00  
8,502.00

Diamond Bank

LMP12  
MP CHECK

8,502.00

SINGTE

**Robert Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Sunday, April 09, 2006 2:45 PM  
**To:** Bob Rainone; dan@hollings.name  
**Subject:** Invoice 00007H from Dan Hollings

**Dan Hollings**  
 6370 Via Amable  
 Tucson, AZ 85750  
 520 299 5626

**Invoice 00007H****The Secret LLC**

1339 W. George Street  
 Chicago, IL 60657  
 773-296-9066

**08 Apr 2006**

Description	Price	Total
Web Services / Project Management	\$8,000.00	\$8,000.00
AND/OR commissions based of web revenues (3/15 - 4/15)	\$0.00	\$0.00
Reimbursement; Marketing Costs (Google)	\$502.00	\$502.00

**Subtotal: \$8,502.00**  
**Total \$8,502.00**  
**Due:**

Invoice Terms: **Due 23 Apr 2006 (NET 15)**  
*All amounts are in U.S. Dollar.*

**Invoices summary page**

5/9/2006

\*071000301\*  
06/06/2006  
6611026964

This is a LEGAL COPY of  
your check. You can use it  
the same way you would  
use the original check.

900250/90 90906055ED  
69041012213

<b>The Secret LLC</b> 1819 W. George Street Chicago, IL 60637		DIAMOND BANK CHICAGO, IL 60610-1388 877100710	1007
PAY TO THE ORDER OF: <u>Don Hollings</u>		5/13/2006	
Nine Thousand Five Hundred Forty-Four and 00/100		\$ 9,544.00	
Don Hollings 6370 Via Amable Tucson, AZ 85750		DOLLARS	
MEMO		[Signature]	
#001007# 62710711011: REDACTED		#0000954400#	

#001007#

62710711011:

REDACTED

#0000954400#

Serial 1007 Amount 0000009544.00 Date 06-06-2006

REDACTED

CD

06/06/2006  
31103188

1517446756

06062006

0710-0030-1

ENT 0193 TRC=019

>122101706< 06/06/2006  
06062006  
0710-0030-1  
ENT 0193 TRC=019

50930E06

002072353128

[Signature]

\*071000301\* 06/06/2006  
6611026964

Do not endorse or write below this line.

The Secret LLC

1007

Dan Hollings					
Date	Type	Reference	Original Amt.	Balance Due	5/13/2006 Discount
05/08/200	Bill	Inv#: 00008	9,544.00	9,544.00	
				Check Amount	Payment
					9,544.00
					9,544.00

Diamond Bank

9,544.00

 LMP12 M/P CHECK

51NB10 

**Robert Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Monday, May 08, 2006 10:36 AM  
**To:** Bob Rainone; Dan Hollings  
**Subject:** Invoice 00008 from Dan Hollings

Bob:

This is my invoice for 4/15 through 5/15. Also, I have not received last months check (4/15 - 4/15), can you perhaps expedite that? Thanks.

Dan

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750  
**Phone:** 520 299 5626  
**Fax:** 520 299 5626

**Invoice 00008**

The Secret LLC  
 1339 W. George Street  
 Chicago, IL 60657  
**Phone:** 773-296-9066

**08 May 2006**  
 Due 23 May 2006 (NET 15)

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	AND/OR commissions based of web revenues (4/15 - 5/15)	\$0.00	\$0.00
1.0 Service	Reimbursement; Marketing Costs (Google)	\$532.00	\$532.00
1.0 Service	Reimbursement; PRweb Press Release	\$240.00	\$240.00
<b>Subtotal:</b>			\$8,772.00
<b>Total Due:</b>			\$8,772.00

Click here to view, print, or forward this invoice online from your client invoice page.  
 You may also link this invoice to a Blinksale account. **This invoice was created with Blinksale, the easiest way to send invoices online.**



Posting Date: 2006-07-05  
 Sequence #: 520329235  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$9684.02  
 Check/Serial #: 000000001029  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 0  
 ItemType: P  
 BOFD: 000000000

1029

THE SECRET LLC  
 1339 WEST GEORGE STREET  
 CHICAGO, IL 60657

JPMORGAN CHASE BANK, N.A.  
 CHICAGO, ILLINOIS 60670  
 2-1-710

6/30/2006

PAY TO THE  
 ORDER OF Dan Hollings

\$ \*\*9,684.02

Nine Thousand Six Hundred Eighty-Four and 02/100\*\*\*\*\* DOLLARS

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750

MEMO

⑈001029⑈ ⑆071000013⑆

REDACTED

⑈0000968402⑈

07/05/2006  
 074909962

0520329235

12-3-06

0017 78087

BANK OF AMERICA, N.A. CHI  
 081000032 L 90 P21  
 07/05/06

8820356361

BANK OF AMERICA, N.A. TPE  
 ⑈1221917064⑈ 07/02/06 P20  
 07/03/06

3250328636

Dan Hollings

THE SECRET LLC


Dan Hollings  
 Date Type Reference  
 6/12/2006 Bill Inv# 00009

1029

Original Amt. 9,684.02  
 Balance Due 9,684.02  
 6/30/2006 Discount  
 Check Amount 9,684.02

Payment  
 9,684.02  
 9,684.02

Chase Checking

 DELUXE BUSINESS FORMS 1-800-328-0304 www.deluxeforms.com

9,684.02

**Robert Rainone**

**From:** Dan Hollings [dan@hollings.name]  
**Sent:** Monday, June 12, 2006 1:25 PM  
**To:** Bob Rainone; Dan Hollings  
**Subject:** Invoice 00009 from Dan Hollings

Bob:

Just curious as to when the accounting will be done on commissions. Also, I copied you separately on the most recent Google ad invoice I paid.

Thanks,  
 Dan

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750  
**Phone:** 520 299 5626  
**Fax:** 520 299 5626

**Invoice 00009**

The Secret LLC  
 1339 W. George Street  
 Chicago, IL 60657  
**Phone:** 773-296-9066

**12 Jun 2006**  
 Due 27 Jun 2006 (NET 15)

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	AND/OR commissions based of web revenues (thru 6/15)	\$0.00	\$0.00
1.0 Service	Reimbursement; Marketing Costs (Google)	\$1,684.02	\$1,684.02
<b>Subtotal:</b>			\$9,684.02
<b>Total Due:</b>			\$9,684.02

Click here to view, print, or forward this invoice online from your client invoice page.  
 You may also link this invoice to a Blinksale account. **This Invoice was created with Blinksale, the easiest way to send invoices online.**



The Secret LLC

1014

Dan Hollings					
Date	Type	Reference	Original Amt.	Balance Due	7/26/2006 Discount
7/12/2006	Bill	Inv# 10	10,164.30	10,164.30	
				Check Amount	Payment
					10,164.30
					10,164.30

Diamond Bank

10,164.30

**Robert Rainone**

**From:** Dan Hollings [do-not-reply-invoices@danhollings.blinksale.com]  
**Sent:** Wednesday, July 12, 2006 2:33 PM  
**To:** Bob Rainone; Dan Hollings  
**Subject:** Invoice 00010 from Dan Hollings

Bob:

I sent the Google report separately. If you want me to cut this or leave it as-is, just let me know. It is producing admirable results.

Dan

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750  
**Phone:** 520 299 5626  
**Fax:** 520 299 5626

**Invoice 00010**

The Secret LLC  
 1339 W. George Street  
 Chicago, IL 60657  
**Phone:** 773-296-9066

**12 Jun 2006**  
 Due 27 Jun 2006 (NET 15)

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	AND/OR commissions based of web revenues (thru 7/15)	\$0.00	\$0.00
1.0 Service	Reimbursement; Marketing Costs (Google)	\$2,164.30	\$2,164.30
<b>Subtotal:</b>			\$10,164.30
<b>Total Due:</b>			\$10,164.30

Click [here](#) to view, print, or forward this invoice online from your client invoice page.  
 You may also link this invoice to a Blinksale account. **This invoice was created with Blinksale, the easiest way to send invoices online.**

Page 1 of 1

Posting Date: 2006-08-30  
 Sequence #: 6210822670  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$10982.08  
 Check/Serial #: 000000001036  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 0  
 Item Type: E  
 BOFD: 000000000

1036

THE SECRET LLC  
 1339 WEST GEORGE STREET  
 CHICAGO, IL 60657

JPMORGAN CHASE BANK, N.A.  
 CHICAGO, ILLINOIS 60670  
 2-1-710

8/23/2006

PAY TO THE  
 ORDER OF Dan Hollings

\$ \*\*10,982.08

Ten Thousand Nine Hundred Eighty-Two and 08/100\*\*\*\*\* DOLLARS

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750

MEMO

⑈001036⑈ ⑆071000013⑆


REDACTED

⑈0001098208⑈

AUG 27 06

BANK OF AMERICA, N.A. TPE  
 ⑈1221017064 E3393 94 P17  
 08/29/06  
 3250847777

0037 20648



THE SECRET LLC


Date	Type	Reference
8/10/2006	Bill	Inv# 12

1036

Original Amt.	Balance Due	8/23/2006	Discount
10,982.08	10,982.08		
			Check Amount

Payment
10,982.08
10,982.08

Chase Checking

 CHASE BUSINESS FORMS 1-800-328-0304 www.chaseforms.com

10,982.08



**Robert Rainone**

**From:** Dan Hollings [do-not-reply-invoices@danhollings.blinksale.com]  
**Sent:** Thursday, August 10, 2006 1:11 PM  
**To:** Bob Rainone; Dan Hollings  
**Subject:** Invoice 00012 from Dan Hollings

Bob:

I sent the Google summary separate. Dan

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750  
**Phone:** 520 299 5626  
**Fax:** 520 299 5626

**Invoice 00012**

The Secret LLC  
 1339 W. George Street  
 Chicago, IL 60657  
**Phone:** 773-296-9066

**12 Aug 2006**  
 Due 27 Aug 2006 (NET 15)

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	AND/OR commissions based on 10% of web THE SECRET site web revenues (from launch thru 8/15)	\$0.00	\$0.00
1.0 Service	Reimbursement; Marketing Costs (Google)	\$2,982.08	\$2,982.08
<b>Subtotal:</b>			\$10,982.10
<b>Total Due:</b>			\$10,982.08

Click here to view, print, or forward this invoice online from your client invoice page.  
 You may also link this invoice to a Blinksale account. **This invoice was created with Blinksale, the easiest way to send invoices online.**

\*071000301\*  
10/03/2006  
6212776877

This is a LEGAL COPY of  
your check. You can use it  
the same way you would  
use the original check.

10/02/2006  
2554904500  
005440675327

<i>The Secret LLC</i> 1319 W. Chicago Street Chicago, IL 60637		1018 9/26/2006
PAY TO THE ORDER OF <u>Dan Hollings</u>		\$ 9,894.92
Nine Thousand Six Hundred Ninety-Four and 92/100 ***** DOLLARS		
Dan Hollings 6370 Via Amabile Tucson, AZ 85750		
MICR ⑈001018⑈ ⑈271071101⑈		⑈0000969492⑈

⑈001018⑈

⑈271071101⑈

REDACTED

⑈0000969492⑈

Serial 1018 Amount 0000009694.92 Date 10-03-2006

REDACTED

1213912429 10032006 0710-0030- 5440675327	⑈001018⑈ ⑈271071101⑈ ⑈0000969492⑈	Dan Hollings	122000164 10/03/2006 ⑈071000301⑈ ⑈212776877⑈
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Do not endorse or write below this line.

**The Secret LLC**

Dan Hollings  
 Date 9/7/2006 Type Bill Reference Inv 13

1018

Original Amt. 9,694.92  
 Balance Due 9,694.92  
 9/26/2006 Discount  
 Check Amount

Payment  
 9,694.92  
 9,694.92

Diamond Bank

9,694.92

LMP12 M/P CHECK

514510

**Robert Rainone**

**From:** Dan Hollings [do-not-reply-invoices@danhollings.blinksale.com]  
**Sent:** Thursday, September 07, 2006 3:59 PM  
**To:** Bob Rainone; Dan Hollings  
**Subject:** Invoice 00013 from Dan Hollings

Google expense report sent separately

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750  
**Phone:** 520 299 5626  
**Fax:** 520 299 5626

**Invoice 00013**

The Secret LLC  
 1339 W. George Street  
 Chicago, IL 60657  
**Phone:** 773-296-9066

**12 Aug 2006**  
 Due 27 Aug 2006 (NET 15)

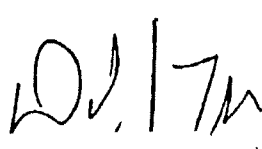
Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	AND/OR commissions based on 10% of THE SECRET site web revenues (from launch thru 9/15)	\$0.00	\$0.00
1.0 Service	Reimbursement; Marketing Costs (Google)	\$1,694.92	\$1,694.92
<b>Subtotal:</b>			<b>\$9,694.92</b>
<b>Total Due:</b>			<b>\$9,694.92</b>

**Invoice Notes**

Google expense report sent separately.

Click here to view, print, or forward this invoice online from your client invoice page.  
 You may also link this invoice to a Blinksale account. **This invoice was created with Blinksale, the easiest way to send invoices online.**

Posting Date: 2006-11-01  
 Sequence #: 1320100989  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$8000.00  
 Check/Serial #: 000000001048  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 0  
 ItemType: P  
 BOFD: 000000000

		1048
<b>THE SECRET LLC</b> 1339 WEST GEORGE STREET CHICAGO, IL 60657	<b>JPMORGAN CHASE BANK, N.A.</b> CHICAGO, ILLINOIS 60670 2-1-710	10/20/2006
PAY TO THE ORDER OF <u>Web Services LLC</u>		\$ **8,000.00
Eight Thousand and 00/100*****		DOLLARS
Dan Hollings 6370 Via Amable Tucson, AZ 85750		
MEMO	#001048# 10710000131:	REDACTED
11912X6 074909962 1320100989		5017 0501
JPMORGAN CHASE BANK, N.A. FORT WORTH, TX 76102 11119013314 5140080520		20061020 Dan Hollings LLC

<https://instantimage.bankone.net/Star/action/Print.do?OfiReqId=1205336289709h001751...> 3/13/2008

Web Services LLC

Commission Advance \$50,000

Commission structure currently under review, and advance being given until calculation finalized.

Proposed to be 10% of net profit before tax on the web site sales. An allocation of overhead to be included in the calculation of net profit.

TS MERCHANDISING LTD.

1016

Web Services LLC			Original Amt.	Balance Due	10/26/2006	Payment
Date	Type	Reference			Discount	
10/26/2006	Bill	commission advance	50,000.00	50,000.00		50,000.00
				Check Amount		50,000.00

Chase - Checking

50,000.00

Page 1 of 1

Posting Date: 2006-11-24  
 Sequence #: 720447853  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$12100.00  
 Check/Serial #: 000000001063  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 0  
 ItemType: P  
 BOFD: 000000000

1063

THE SECRET LLC  
 1339 WEST GEORGE STREET  
 CHICAGO, IL 60657

JPMORGAN CHASE BANK, N.A.  
 CHICAGO, ILLINOIS 60670  
 2-1-710

11/10/2006

PAY TO THE  
 ORDER OF Web Services LLC

\$ \*\*12,100.00

Twelve Thousand One Hundred and 00/100

DOLLARS

Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750

MEMO

⑈00 106 3⑈ ⑆07 10000 13⑈

REDACTED

⑈000 12 10000⑈

1124276  
 674909962

0720447853

NOV 22 06 11

JPMORGAN CHASE BANK, N.A.  
 FORT WORTH, TX 76102  
 ⑈1119013314⑈  
 5240344793

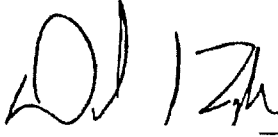
6011 03521

*Handwritten signature:*  
 Dan Hollings

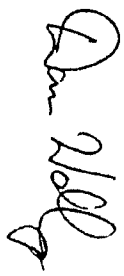


Page 1 of 1

Posting Date: 2006-12-26  
 Sequence #: 5120842701  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$16000.00  
 Check/Serial #: 000000001079  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 0  
 ItemType: P  
 BOFD: 000000000

		1079
<b>THE SECRET LLC</b> 1339 WEST GEORGE STREET CHICAGO, IL 60657		JPMORGAN CHASE BANK, N.A. CHICAGO, ILLINOIS 60670 2-1-710
		12/15/2006
PAY TO THE ORDER OF <u>Web Services LLC</u>		\$ **16,000.00
Sixteen Thousand and 00/100.....		DOLLARS
Dan Hollings 6370 Via Amable Tucson, AZ 85750		
MEMO		
"00 10 79" "07 10000 131		REDACTED 000 16000000

12262006 074909962 5120842701	0000001079	
	JPMORGAN CHASE BANK, N.A. > 111901331 < POSITION 12/20/2006 9740072405 6620 04 0000000713231520 640369	
1221244 11191331 5440303332		

THE SECRET LLC

Web Services LLC

Date	Type	Reference
12/8/2006	Bill	Inv 00016
12/15/2006	Bill	Bonus

Original Amt.	Balance Due	12/15/2006 Discount	Check Amount
8,000.00	8,000.00		
8,000.00	8,000.00		

1079

Payment
8,000.00
8,000.00
16,000.00

Chase Checking

16,000.00

**Don Zyck**

**From:** Dan Hollings www.DanHollings.com [dhollings@mac.com]  
**Sent:** Thursday, December 07, 2006 6:10 PM  
**To:** Don Zyck  
**Subject:** Don, sorry if the date was wrong :-)

Don: My invoice sent recently should have been dated for DECEMBER (oops!)

Please make check payable: Web Services LLC

**Web Services LLC**

Managing member: Dan Hollings  
 6370 Via Amable  
 Tucson, AZ 85750  
**Phone:** 520 299 5626  
**Fax:** 520 299 5626  
**Invoice 00016**

**The Secret LLC**

**06 Dec 2006**  
 Due 06 Dec 2006 (Due Upon Receipt)

1339 W. George Street  
 Chicago, IL 60657  
**Phone:** 773-296-9066

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	AND/OR commissions based on 10% of THE SECRET site web revenues (from launch thru 12/15) minus advances.	\$0.00	\$0.00
<b>Subtotal:</b>			\$8,000.00
<b>Total Due:</b>			\$8,000.00

**Invoice Notes**

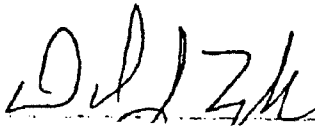
Please make check payable: Web Services LLC

Click [here](#) to view, print, or forward this invoice online from your client invoice page.

You may also link this invoice to a Blinksale account. **This invoice was created with Blinksale, the easiest way to send invoices online.**

Page 1 of 1

Posting Date: 2007-01-29  
 Sequence #: 6520220570  
 Account #: REDACTED  
 Routing Transit: 07100001  
 Amount #: \$20000.00  
 Check/Serial #: 000000001144  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 0  
 ItemType: P  
 BOFD: 000000000

<b>TS MERCHANDISING LTD.</b> 2950 N LINCOLN AVE CHICAGO, IL 60657 (773) 281-7777		<b>JPMORGAN CHASE BANK, N.A.</b> CHICAGO, ILLINOIS 60670 2-1-710		1144
PAY TO THE ORDER OF <u>Web Services LLC</u>		1/19/2007		DOLLARS
Twenty Thousand and 00/100*****		\$ **20,000.00		
MEMO Web Services LLC Dan Holland 6370 Via Amable Tucson, AZ 85750				0000 20000000
⑈001144⑈ ⑆071000013⑆		REDACTED		

⑆1292917  
 074909962  
 6520220570

JPMORGAN CHASE BANK, N.A.  
 FORT WORTH, TX 76102  
 ⑈111901331⑈  
 5340242809

6028  
 \$ 9024

Dan Holland

TS MERCHANDISING LTD.


1144

Web Services LLC

Date	Type	Reference	Original Amt.	Balance Due	1/19/2007 Discount	Payment
1/19/2007	Bill	Inv#00017	20,000.00	20,000.00		20,000.00
					Check Amount	20,000.00

Chase - Checking

20,000.00

 DELUXE BUSINESS FORMS 1-800-328-0304 www.deluxeforms.com

Phone: (773) 281-7777 x110

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	Customer Support Service via Matt Holsonback and team.	\$12,000.00	\$12,000.00
1.0 Service	AND/OR commissions based on 10% of THE SECRET site web revenues (from launch thru 01/15/2007) minus advances.	\$0.00	\$0.00
<b>Subtotal:</b>			\$20,000.00
<b>Total Due:</b>			\$20,000.00

**Invoice Notes**

Please make check payable: Web Services LLC

This invoice replaces an earlier invoice for same time period.

Click here to view, print, or forward this Invoice online from your client invoice page.  
 You may also link this invoice to a Blinksale account. **This invoice was created with Blinksale, the easiest way to send invoices online.**

1/19/2007

Don:

This invoice replaces the earlier invoice for same time period.

Thanks.



**Web Services LLC**  
*Managing member: Dan Hollings*  
 6370 Via Amable  
 Tucson, AZ 85750  
**Phone:** 520 299 5626  
**Fax:** 520 299 5626

### Invoice 00017

**TS Merchandising Ltd**

2950 N Lincoln Ave

Chicago, IL 60657

**Phone:** (773) 281-7777 x110

**08 Jan 2006**

Due 08 Jan 2006 (Due Upon Receipt)

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	Customer Support Service via Matt Holsonback and team.	\$12,000.00	\$12,000.00
1.0 Service	AND/OR commissions based on 10% of THE SECRET site web revenues (from launch thru 01/15/2007) minus advances.	\$0.00	\$0.00
<b>Subtotal:</b>			\$20,000.00
<b>Total Due:</b>			\$20,000.00

### Invoice Notes

Please make check payable: Web Services LLC

This invoice replaces an earlier Invoice for same time period.

Click [here](#) to view, print, or forward this invoice online from your client invoice page.  
 You may also link this invoice to a Blinksale account. **This invoice was created with Blinksale, the easiest way to send invoices online.**

Posting Date: 2007-03-05  
 Sequence #: 5020125143  
 Account #: **REDACTED**  
 Routing Transit: 07100001  
 Amount #: \$8000.00  
 Check/Serial #: 000000001214  
 Bank #: 111  
 Tran Code: 000000  
 IRD: 0  
 ItemType: P  
 BOFD: 000000000

<b>TS MERCHANDISING LTD.</b> 2950 N LINCOLN AVE CHICAGO, IL 60637 (773) 281-7777		<b>JPMORGAN CHASE BANK, N.A.</b> CHICAGO, ILLINOIS 60670 2-1-710		1214
PAY TO THE ORDER OF <u>Dan Hollings</u>		<u>2/27/2007</u>		Dollars on back Security Features Included
\$ **8,000.00		DOLLARS		
Eight Thousand and 00/100*****				
Dan Hollings 8370 Via Amable Tuscon, AZ 85750				
MEMO				
*001214* 071000013:				
REDACTED 0000800000				

83952007  
 074909962

5020125143

JP MORGAN CHASE BANK, NA  
 FORT WORTH, TX 76102  
 1113613314 015 5830 29  
 5340130830

6052 65153

*Dan Hollings*

**Invoice 00018**

2950 N Lincoln Ave  
Chicago, IL 60657  
USA  
Phone: (773) 281-7777 x110

08 Feb 200

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
1.0 Service	Customer Support Service via Matt Holsonback and team.	\$18,000.00	\$18,000.00
1.0 Service	AND/OR commissions based on 10% of THE SECRET web revenues (from launch thru 02/15/2007) minus advances.	\$0.00	\$0.00
<b>Subtotal:</b>			\$26,000.00
<b>Total Due:</b>			\$26,000.00

**Invoice Notes**

Please make check payable: Web Services LLC

TS MERCHANDISING LTD.

1214

Dan Hollings				2/27/2007		
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
2/27/2007	Bill	inv#00018	8,000.00	8,000.00		8,000.00
				Check Amount		8,000.00

Chase - Checking

8,000.00



**Buckley, Michelle M.**

**From:** Dan Hollings [www.DanHollings.com](http://www.DanHollings.com) [[dhollings@mac.com](mailto:dhollings@mac.com)]  
**Sent:** Tuesday, February 27, 2007 1:04 PM  
**To:** Don Zyck  
**Subject:** Re: Has this been sent? Invoice 00018

Thanks - I always invoice around the 8th of each month. If you don't receive it just let me know. But I do appreciate you overnighting.

Dan

On Feb 27, 2007, at 9:11 AM, Don Zyck wrote:

No, was going to ask you about this, had not seen it yet this month. Will put in overnight mail tonight,

**Don Zyck**

The Secret

Prime Time US, Inc

TS Merchandising Ltd

773 281 7777 ext 102

**From:** Dan Hollings [www.DanHollings.com](http://www.DanHollings.com) [<mailto:dhollings@mac.com>]  
**Sent:** Tuesday, February 27, 2007 9:48 AM  
**To:** Don Zyck  
**Subject:** Has this been sent? Invoice 00018

**Invoice 00018**

08 Feb 200

2950 N Lincoln Ave

Chicago, IL 60657

USA

Phone: (773) 281-7777 ext 102

3/25/2008

Qty	Description	Price	Total
1.0 Service	Web Services - Project Management	\$8,000.00	\$8,000.00
1.0 Service	Customer Support Service via Matt Holsonback and team.	\$18,000.00	\$18,000.00
1.0 Service	AND/OR commissions based on 10% of THE SECURE web revenues (from launch thru 02.15.2007) minus advances	\$0.00	\$0.00

**Subtotal:**

\$26,000.00

**Total Due:**

\$26,000.00

**Invoice Notes**

Please make check payable: Web Services LLC

**Buckley, Michelle M.**

**From:** Dan Hollings www.DanHollings.com [dhollings@mac.com]

**Sent:** Tuesday, February 27, 2007 8:48 AM

**To:** Don Zyck

**Subject:** Has this been sent? Invoice 00018

## Invoice 00018

2950 N Lincoln Ave  
Chicago, IL 60657  
USA

08 Feb 200

**Phone:** (773) 281-7777 x110

Qty	Description	Price	Total
1.0 Service	Web Services / Project Management	\$8,000.00	\$8,000.00
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<b>Subtotal:</b>			\$26,000.00
<b>Total Due:</b>			\$26,000.00

### Invoice Notes

Please make check payable: Web Services LLC

## EXHIBIT 3

Hollings, Loretta (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TS Merchandising Ltd., a British	)	
Virgin Islands corporation, and TS	)	
Production LLC, a Hungarian	)	
limited liability company,	)	
	)	No. 07 C 6518
Plaintiffs,	)	
	)	
vs.	)	
	)	
Dan and Loretta Hollings, Arizona	)	
residents, and Web Services, LLC,	)	
an Arizona limited liability	)	
company,	)	
	)	
Defendants.	)	
	)	

DEPOSITION OF LORETTA HOLLINGS

Tucson, Arizona  
March 12, 2008  
1:36 p.m.

Prepared for:  
MR. CHRISTOPHER I. CEDILLO

(Copy)

Prepared By:  
LISA J. ANDERSON, RPR  
Certified Reporter  
Certificate Number 50079  
CANYON STATE REPORTING  
2415 E. Camelback, Suite 700  
Phoenix, AZ 85016-4245

Hollings, Loretta (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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01:43:17 1 Q. Okay. Do you know how often he puts money into  
01:43:20 2 your joint accounts?

01:43:22 3 A. I don't know that either.

01:43:33 4 Q. Is there anyone else putting money into your  
01:43:36 5 joint accounts besides Mr. Hollings?

01:43:38 6 A. I don't believe so.

01:43:43 7 MR. PARKER: I'm sure she would allow you to.

01:43:47 8 BY MR. CEDILLO:

01:43:54 9 Q. Back to the broader question. Does -- between  
01:44:02 10 you and your husband, does one or the other, say, handle  
01:44:08 11 actual payment of bills?

01:44:10 12 A. He does.

01:44:10 13 Q. He does?

01:44:11 14 A. Uh-huh.

01:44:16 15 Q. So, for example, I understand that Mr. Hollings  
01:44:24 16 and his company might have -- there's a home office phone  
01:44:31 17 and a home phone and a cell phone at one time. If those  
01:44:39 18 bills needed to be paid, who writes the check or perhaps  
01:44:45 19 clicks the pay this bill on the computer?

01:44:51 20 A. He does.

01:44:52 21 Q. He does?

01:44:53 22 A. Yes.

01:44:53 23 Q. Do you have your own cell phone?

01:45:03 24 A. Yes, I do.

01:45:08 25 Q. And does that connect to your own number as

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Hollings, Loretta (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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01:45:16 1 distinct from, for example, Mr. Hollings' own cell phone  
01:45:20 2 number?

01:45:21 3 A. Yes. It's distinct.

01:45:25 4 Q. And how does that cell phone bill get paid?

01:45:28 5 A. He pays for that.

01:45:29 6 Q. Okay. I understand that Mr. Hollings drove you  
01:45:54 7 here today; is that correct?

01:45:56 8 A. Yes, he did.

01:45:57 9 Q. Do you have your own car?

01:45:59 10 A. We own two cars jointly.

01:46:02 11 Q. Okay. You have two cars and you said you own  
01:46:06 12 them jointly?

01:46:06 13 A. Yes, uh-huh.

01:46:31 14 Q. The insurance for those cars, do you know how  
01:46:36 15 those get paid?

01:46:38 16 A. Progressive is the insurance company and I think  
01:46:41 17 he -- well, he pays for that through his automatic bill  
01:46:46 18 payment.

01:46:46 19 Q. Okay. How long have you been married to  
01:47:02 20 Mr. Hollings?

01:47:02 21 A. Almost 25 years.

01:47:12 22 Q. Have you always lived in Arizona -- well, since  
01:47:14 23 you've been married, have you always lived in Arizona?

01:47:17 24 A. We haven't always lived in Arizona. We've lived  
01:47:20 25 in Arizona now for about eight and a half years; and

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Hollings, Loretta (Cedillo)

March 12, 2008

TS Merchandising v. Hollings

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01:47:23 1 before that, we lived in Jacksonville, Florida, and we  
01:47:27 2 were there for, oh, about a year and a half. Not that  
01:47:31 3 long. And before that, we lived in Mobile, Alabama for  
01:47:38 4 probably about five, five and a half years.

01:47:56 5 Q. At the end of the year, do you file joint tax  
01:48:00 6 returns or individual, do you know?

01:48:03 7 A. Jointly.

01:48:15 8 Q. And the income that would be listed on those tax  
01:48:20 9 returns, generally the majority of it would be from  
01:48:24 10 Mr. Hollings' work; is that correct?

01:48:25 11 A. That is correct.

01:48:27 12 Q. Can you make a guess as to what percentage of  
01:48:35 13 income listed on those tax returns would be due to  
01:48:39 14 Mr. Hollings' earnings?

01:48:42 15 A. Probably 99 percent.

01:48:43 16 Q. Okay. Are you familiar with a company called  
01:49:05 17 Web Services LLC?

01:49:07 18 A. Yes. I understand that's his business account.

01:49:12 19 Q. Okay. And are you -- your husband is the  
01:49:23 20 managing member of that company. Are you a member of that  
01:49:25 21 company?

01:49:26 22 A. No.

01:49:28 23 Q. Are you a director?

01:49:30 24 A. No.

01:49:32 25 Q. Have you ever been an employee of that company?

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